

NEVADA DIVISION OF ENVIRONMENTAL PROTECTION

FACT SHEET

(pursuant to NAC 445A.236)

Permittee Name: White Pine Energy Associates, LLC - White Pine Energy Station
400 Chesterfield Center, Suite 110
St. Louis, Missouri 63017

Permit Number: NEV2006513

Description of Discharge Discharges will include intermittent flows of precipitation resulting from incidental stormwater onto the pond facility, stormwater runoff from the coal pile, runoff from the fly ash solid waste disposal site, boiler and equipment cleaning wastewater, miscellaneous equipment sumps and floor drains, wash water, filter system backwash, neutralization tank effluent and or bypass water, and leachate water from the solid waste disposal facility all are to be discharged into the three cell double high density polyethylene (HDPE) lined (80 mil Agru drain primary liner and a 60 mil secondary liner) evaporation pond with leak detection sumps installed in each cell. The evaporation pond is designed as a zero discharge pond with evaporation being the only method of discharge.

Location: White Pine Energy Station (WPES)
Approximately 33 miles North of Ely, Nevada
West of SR 93 (near mile marker 86.9)

Latitude: 39.7304 N; Longitude: 114.7775 W
Section 31, T. 22N., R. 64E. MDB&M

White Pine County, Nevada

Characteristics: Groundwater supplies to the facility will require typical water treatment such as clarification, softening, filtration and demineralization. Due to the supercritical design, the facility's pulverized coal-fired boilers will not create a boiler blowdown wastewater stream. Wastewater stream discharges will not be continuous from operations of the WPES facility, rather, the largest flows to the evaporation pond on an annual basis will derive from non-process stormwater runoff from the coal storage piles. The evaporation pond is designed to accommodate maximum inflows from all sources including the 24-hour 100 year design storm event while maintaining a three foot freeboard.

Flow: 0.051 MGD Monthly Average; 0.073 MGD Maximum Daily Flow of process flows are to be monitored continuously via an in-line flow meter, logged daily, and reported quarterly for Outfall 001. Outfall 001 is to the Zero Discharge evaporation pond. Flows will be measured downstream of the White Pine Energy Station facility's wastewater collection system piping and effluent export pump facility, prior to discharge into the evaporation pond three cell system. Flows derived from the coal pile and the solid waste landfill will also be monitored.

Parameters: Monitored Quarterly; TDS, Specific conductivity, TSS, sodium, hardness as

CaCO₃, chloride, sulfate, pH, ammonia as N, phosphorus as P. Annually during the 4th Quarter: Oil and Grease, TPH, total nitrogen as N, boron, iron, manganese, and sulfur. A Priority Pollutant Metals Scan (13 metals) to be monitored annually, the 4th Quarter.

General: White Pine Energy Associates, LLC (WPEA) proposes to operate the White Pine Energy Station (WPES), up to a nominal 1,600 megawatt coal-fired electric generating station composed of

FACT SHEET
White Pine Energy
NEV2006513
Page 2

up to three units. Each unit is comprised of one supercritical pulverized coal (PC) fired boiler and a steam turbine generator. The units will utilize a hybrid cooling system to minimize water consumption. Facility water will be supplied from a raw water source in the area of the facility.

The WPES will be designed to burn Powder River Basin subbituminous coal which can be blended with low sulfur Colorado or Utah bituminous coals. The coal will be transported to the facility by rail on the Nevada Northern railroad from the main UPRR connection at Shafter, and will be stored onsite prior to use. Ultra low sulfur fuel oil will be used as the start-up fuel for the PC-fired boilers, and for operation of an auxiliary boiler. In addition to generating units, the WPES will include storage and handling facilities for coal, ash, lime, halogenated activated carbon, distillate fuels, and gasoline. The WPES will also include rail facilities, roads, transmission facilities, various support buildings, an emergency firewater pump, and an emergency diesel generator.

Coal combustion products and scrubber products will be disposed of in an onsite lined Class III industrial solid waste industrial disposal facility. Wastewater from the facility systems will be recovered and reused to the extent practical to minimize effluent generation. Wastewater that can no longer be reused will be discharged to the onsite lined evaporation pond system.

Three supercritical pulverized coal-fired boilers will generate steam to drive condensing steam-turbine generators. Air emissions from each boiler will pass through air emission control equipment using the best available technology for emissions control, and exit from a 600 foot tall stack. Diesel fuel oil will be used for boiler startup and flame stabilization during loads up to 25%, after which coal will fuel the facility. An auxiliary boiler will be used during startup of the PC-fired boilers or when the boilers may be off line. There are onsite facilities for materials handling, and storage facilities for ash, lime, and halogenated activated carbon.

The three cells of the HDPE lined evaporation pond total 36 acres, and each is approximately 9-12 feet deep along the west pond cell margin. Each cell is separated by a berm with the leak detection and recovery system sump located in the northwest corner of each cell; weekly inspection of the sumps will be required. Piping discharges the wastewater to each cell, with HDPE wear strips welded beneath each discharge location.

The bottom of each cell slopes to the west, with the east area of each cell averaging about 6 feet deep at capacity. A three foot freeboard will be maintained in each cell, and a water level measurement device will be installed in each. The evaporation pond will be fenced in accordance with NDEP permit requirements, and it is designed to have a zero-discharge standard of performance.

Raw water will be supplied to the facility from a wellfield of approximately 8 wells, which generally lie in a north-south axis north of the plant site. A pipeline will interconnect the wells with the facility. Duck Creek lies approximately 3/4 of a mile to the west of the evaporation pond.

Domestic sewage generated on site is planned to be discharged to an individual septic system on site.

Receiving Water Characteristics: Shallow groundwater (18-24 feet) meets drinking water standards. There will be no discharge as the pond meets a Zero Discharge standard of performance.

Pond water levels will be monitored to ensure freeboard levels, and the leak detection sumps shall be inspected to prevent impacts to groundwater should the pond primary liners leak.

Several groundwater monitoring wells will be required to be monitored downgradient of the pond system. Upgradient monitoring will be required to establish background water quality.

Procedures for Public Comment:

The notice of the Division's intent to issue a permit authorizing the facility to discharge to the surface water of the evaporation ponds subject to the conditions contained within the permit, is being sent to the **Reno Gazette-Journal, Las Vegas Review-Journal, and The Ely Times** for publication. The notice is being mailed to interested persons on our mailing list. Anyone wishing to comment on the proposed permit can do so in writing for a period of 30 days following the date of the public notice, by September 30, 07. The comment period can be extended at the discretion of the Administrator.

A public hearing on the proposed determination can be requested by the applicant, any affected State, any affected interstate agency, or any interested agency, person or group of persons.

The request must be filed within the comment period and must indicate the interest of the person filing the request and the reasons why a hearing is warranted.

Any public hearing scheduled by the Administrator must be conducted in the geographical area of the proposed discharge or any other area the Administrator determines to be appropriate. All public hearings must be conducted in accordance with NAC 445A.238.

The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

Proposed Determination

The Division has made the tentative determination to issue the proposed permit for a period of five (5) years.

Schedule of Compliance and Special Conditions

1. A revised Operations and Maintenance Manual shall be submitted for review and approval within 6 months of facility start-up and discharge to the pond system.
2. The Division shall be notified within 14 days of plant start-up.
3. Photo documentation of each of the three cells of the evaporation pond shall be submitted quarterly with the DMR reports.

Rationale for Permit Requirements

Groundwater Monitoring is required to ensure that groundwater quality is not adversely affected. Pond water quality monitoring is required to ensure proper operation of the ponds and to characterize the water contained within the evaporation ponds.

Prepared by: IcyI Mulligan
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